

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-401-E**

IN RE: Request of Beulah Solar, LLC for  
Modification of Interconnection  
Agreement with South Carolina Electric  
& Gas Company

**MOTION  
TO HOLD DOCKET IN  
ABEYANCE**

## INTRODUCTION

Beulah Solar, LLC (“Beulah Solar”), and Eastover Solar LLC, (“Eastover Solar”), (hereinafter sometimes referred to together as, “Beulah Solar/Eastover Solar”), both have Requests for Modifications pending in this Docket. Eastover Solar was allowed to Intervene and participate in this Docket, by Commission Order No. 2019-92, dated January 30, 2019. The nexus of both Requests for Modifications is South Carolina Electric & Gas Company’s (hereinafter as, the “Company”), inclusion of “curtailment language” in the Company’s Interconnection Agreements (hereinafter as, “IAs”), **which language has not been approved by this Commission.**

## Stakeholder Process on “Curtailment Language”.

A stakeholder process to address solar developers’ concerns about, *inter alia*, curtailment language, has recently been established. The stakeholder process is between the South Carolina Solar Business Alliance, Inc. (“SCSBA”), Dominion and the Company and the stakeholder process is to be facilitated by the South Carolina Office of Regulatory Staff, (“ORS”). The stakeholder process is memorialized in a Settlement Agreement dated November 30, 2018, which Agreement was approved by this Commission.

### Initial Stakeholder Process Meeting.

The initial stakeholder process meeting has been scheduled for March 7, 2019 and attendance at the initial meeting has been confirmed by SCSBA, ORS, and the Company.

## Reason for Request.

Because (i) the Company continues to utilize curtailment language in its IAs, not approved by this Commission (ii) the Company's actions adversely affect Beulah Solar/Eastover Solar, and (iii) as described hereinabove, Beulah Solar/Eastover Solar will participate in a stakeholder process in the near future, on March 7, 2019, with the Company and ORS, to alleviate Beulah Solar/Eastover Solar's concerns about the unapproved "curtailment language" in the Company's IAs, this Docket should be held in abeyance, pending the outcome of the stakeholder process on, *inter alia*, "curtailment language". It is likely that this Docket may be administratively closed after the stakeholder process is completed. Beulah Solar/Eastover Solar's Motion follows.

### MOTION

The grounds for this Motion are that, as is set forth in detail hereinabove, the stakeholder process, when concluded, may allow this Docket to be administratively closed, which will result in a savings of monetary expense for the parties and conservation of judicial economy for this Commission.

It is unreasonable and unfair to Beulah Solar/Eastover Solar for this Docket to remain active, when there is a stakeholder process, agreed to by the Company, which will likely lead to changes in the “curtailment language” currently in use by the Company, which “curtailment language” has not been approved by this Commission. As stated, the initial stakeholder process meeting will occur on March 7, 2019, which date is quickly approaching, making Beulah Solar/Eastover Solar’s request all the more appropriate.

### CONCLUSION

Based on the foregoing, this Commission should order that Docket 2018-401-E, be held in abeyance, pending the outcome of the events described hereinabove. This Commission should grant the relief sought and such other and further relief as it may deem appropriate.

Respectfully Submitted,

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Columbia, South Carolina